

Subject: Meridian Square: Application for Advertisement Consent for Internally

Illuminated digital media screen (3m high x 11.3m wide x 0.40m deep) fixed to the south-western elevation of the Westfield Office Block (approved under application reference 16/00524/FUL) at Great Eastern

Road, Stratford (18/000225/ADV)

Meeting date: 24 July 2018

Report to: Planning Decisions Committee

Report of: Anne Ogundiya, Principal Planning Development Manager

FOR DECISION

This report will be considered in public

1. EXECUTIVE SUMMARY

- 1.1. This report considers an advertisement consent for an internally illuminated digital media screen affixed to the south-western elevation of the proposed 18 storey (83.1m AOD high) Westfield office block (phase 2 development) approved under application reference 15/00524/FUL (a two-phased development comprising phase 1 the 14 storey YHA building and phase 2 an 18-storey office block), but yet to be implemented. The proposal would replace an existing standalone media advertising screen of similar dimensions on the site. The media screen would be used for general commercial advertising.
- 1.2. The proposed digital media screen was shown illustratively on the YHA/office proposals and at the time of its consideration Members expressed a desire for the advertising proposals to be considered by the Planning Decisions Committee.
- 1.3. The application site is located within Stratford Metropolitan Centre and is situated on Great Eastern Road. The site is located within Meridian Square at the bottom of the town centre link bridge stairs.
- 1.4. Applications for advertisement consent have to be assessed on grounds of visual amenity and public safety, taking into account relevant planning policies and any other relevant factors.
- 1.5. The assessment is that having regard to relevant planning policies, the context of the site i.e. its town centre location and the position and orientation of the office block to which the advertisement would be affixed, the digital media screen is visually acceptable and does not give rise to any amenity or safety issues. The media screen would add to the vibrancy of this part of the town centre. In this context, it is considered that the proposed media screen would be appropriate in the proposed location, and the scale and design would not be detrimental to the visual amenity of the building and the street scene.
- 1.6. The proposal is considered to be acceptable in planning policy terms. As such, it is recommended that advertisement consent is granted, subject to conditions.

2. RECOMMENDATIONS

2.1. The Committee is asked to:

- 1. Grant advertisement consent for the application ref 18/00225/ADV for the reasons given in the report subject to the conditions set out at section 13 of this report; and
- 2. Agree to delegate authority to the Director of Planning Policy and Decisions to finalise the recommended conditions as set out in this report including such refinements, amendments, additions and/or deletions as the Director of Planning Policy and Decisions considers reasonably necessary.

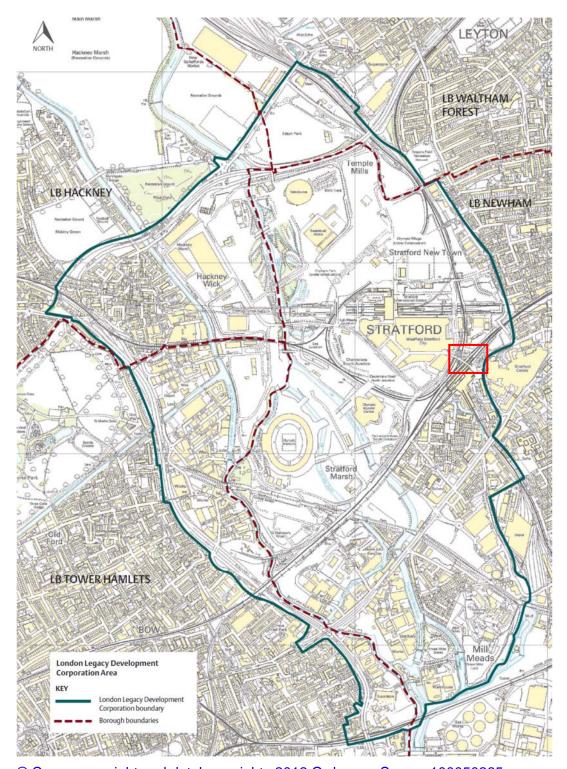
3. FINANCIAL IMPLICATIONS

3.1 There are no financial implications.

4. LEGAL IMPLICATIONS

4.1. There are no financial implications.

Site Plan



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Location: Great Eastern Road, Stratford

London Borough: Newham

Applicants: Westfield UK Property Developments Ltd

Agent/Design Team: Dp9 / Suttonca Architects

5. SITE & SURROUNDINGS

- 5.1. The site is located to the south east of Great Eastern Road where it adjoins the steps and escalator accessing the Town Centre Link Bridge between Meridian Square and the Westfield Centre. The site is the land currently used as a British Transport Police facility and Network Rail parking. There are station assets and an emergency access from the station within the site. There is also a coach bay along the northern end of Great Eastern Road.
- 5.2. Stratford Regional Station and Stratford Bus Station are located immediately to the south of the application site on Meridian Square with an additional station entrance on the halfway level of the steps to the Town Centre Link Bridge.
- 5.3. On the opposite side of Great Eastern Road is the Stratford Centre and associated multi storey car park within the LB Newham planning authority area. Great Eastern Road (A118) currently forms part of the one-way Stratford gyratory traffic system and is part of the Strategic Road Network. The LB of Newham's / TfL Stratford Gyratory Project proposes to convert the roads around Stratford town centre including Great Eastern Road to two-way traffic together with cycle route, public realm and pedestrian crossing improvements.
- 5.4. The site falls within the boundary of Zone 1 of the Stratford City development area. This part of Zone 1 to the south east of the railway is occupied by three other development sites between the application site and the junction with Angel Lane. These are: the 33-storey residential development (Stratford Central 181 units) (under construction); the 8-storey completed Moxy Hotel development which provides 279 bedrooms and the completed Unite student accommodation (699 single rooms and 60 studios) up to 14 storeys at the Angel Lane junction.

6. DESCRIPTION OF DEVELOPMENT

- 6.1. The proposed digital media screen would be 7.75m above ground level at its highest point and be 11.3m wide x 3m in height and 400mm deep. The media screen is proposed to replace an existing standalone digital media screen (3.6m high x 12.7m wide x 500mm deep) of slightly larger dimensions on the adjoining site. However, as proposed the digital media screen would be located on the south-western elevation of the 'phase 2 office block' (described in paragraphs 7.2 to 7.5 below), and would be affixed to the building's concrete columns. It should be noted that the phase 2 office block has not yet been constructed.
- 6.2. The digital media screen would be located on level 3 of the office block i.e. above the split-level mezzanine floor which would accommodate a mix of retail uses. It would be 4.4m from the ground level. The proposed media screen is smaller than the existing screen.
- 6.3. The digital media screen would be erected in line with the reconstituted stone façade above with a separation gap from the building façade of 350mm. The screen would sit back from the level 2 retail use glass balcony which aligns with the town centre link bridge escalators. The shroud to the media screen is proposed to be stainless steel.
- 6.4. The advertisement would be internally illuminated. The applicant states that the media screen would be internally lit with an luminance level of 300cd/m2.
- 6.5. Elevations and visuals are included in the appendices.
- 6.6. The existing standalone digital media screen within Meridian Square, which is part of a host of advertisements (11/90036/ADVODA see paragraph 7.8) covering zone 1 was granted a 5-year advertisement consent in 2011 expiring in August 2017. The applicant has advised that they would be seeking to regularise the consent i.e. by

submitting an advertisement consent application for its extension. Should advertisement consent be granted for the proposed digital media screen the existing standalone digital media screen would be in place until the office development is completed and the new digital media screen would be incorporated within the office block.

7. RELEVANT PLANNING HISTORY

On and Around the Application Site:

- 7.1 The site lies within Zone 1 of the Stratford City Development area that was originally used for a range of railway related uses.
- 7.2 The original Stratford City outline consent was granted in 2005 and included consent for a range of commercial, retail and residential uses including hotels. A number of variations and related submissions have been made since the original consent. Application reference 10/90061/OUMODA covered the Cherry Park area (north of the railway) and part of the Angel Lane area of Zone 1 (but excluded the current application site). This outline consent was approved in March 2012 and was mainly for residential uses (99,870m2) but included some commercial uses including 6,311m2 of hotel floorspace (C1) in the Cherry Park area.
- 7.3 11/90036/ADVODA Advertisement consent granted on the 17th August 2011 for 13 advertisements, of two types. Five media screens surface mounted to buildings and 8 free standing digital advertisements located on the Town Centre Link and within the public realm of zone 1.
- 7.4 Application reference 13/00275/VAR to vary permission 10/90061/OUMODA was approved on the 17th October 2013. The effect of this variation was to increase the density and amount of residential floorspace to be built on the Cherry Park area.
- 7.5 Application reference 15/00358/OUT was approved on the 13th February 2018, and is under construction for retail and residential development on the Cherry Park site.
- 7.6 Application reference 12/00221/FUM was granted on the 30th September 2013 for the Unite student housing scheme on land at Angel Lane immediately to the east of the application site. The development provides 759 student bedrooms This development is completed and occupied.
- 7.7 Application reference 13/00322/FUL was granted on the 24th August 2014 for a 33-storey tower to provide 181 residential units in a mix of 1, 2 and 3 bedroom dwellings with ancillary gym. This is under construction.
- 7.8 Application reference 14/02289/FUL Considered by LB Newham (Stratford Centre) granted in January 2016 for a mixed use residential led scheme providing 587 residential units in 42 and 25 storey towers in addition to commercial uses, access changes and new public routes. This application is located directly to the south of the Legacy Corporation's boundary. The scheme has not been implemented.
- 7.9 Application reference 15/00053/ADV Application for Advertisement Consent for the display of vinyl adhesive adverts on northern and southern glazed panels of the Town Centre Link Bridge for three x temporary four week periods per year, including associated permanent lighting. Advertisement consent granted on appeal 7th March 2015.
- 7.10 Application reference 15/00536/ADV Application for advertising consent for the display of vinyl adhesive adverts on northern and southern glazed panels on the Town Centre Link Bridge for 1x temporary four-week period to be completed within one year from the date of planning permission, including associated permanent lighting. Withdrawn 27th November 2015.

Application Site:

- 7.11 On the 27th March 2018 under planning reference 16/00524/FUL planning permission was granted for a part eighteen-storey part fifteen-storey building comprising 22,726 sqm (GEA) of office (use class B1a) and 369 sqm (GEA) of retail floorspace (use class A1-A5) and a fourteen-storey building comprising a 192-bedroom youth hostel facility (sui generis use), together with landscaping, public realm and other associated works.
- 7.12 The proposed office and youth hostel buildings will form separate phases of development, be structurally independent, and will both front onto Great Eastern Road to the east/south east.
- 7.13 The Youth Hostel building (phase 1) is on the eastern part of the site adjoining the Stratford Central residential tower under construction. The building is 14 storeys with a total of 192 rooms providing a total of 846 bed spaces with each room having ensuite toilet / shower.
- 7.14 The office building (phase 2) to which the proposed digital media screen would be affixed would be sited immediately adjoining the stairs and escalator accessing the Town Centre Link Bridge from Meridian Square.
- 7.15 On the 12th October 2017, under planning reference 17/00280/FUL planning permission was granted for the demolition of the existing British Transport Police building, together with the construction of a new temporary station escape ramp and associated works.
- 7.16 On the 4th July 2018, under planning reference 18/00245/FUL planning permission was granted for the construction of a temporary station escape stair and associated works.

8. POLICIES & GUIDANCE

National Planning Policy Framework (NPPF)

- 8.1. Planning policies contained within the National Planning Policy Framework (March 2012) are relevant to the application and the over-arching principle of the Framework is that local authorities should be positive and proactive in encouraging sustainable growth and addressing barriers to investment. The NPPF should be read in conjunction with the national Planning Practice Guidance, a web-based resource for all users of the planning system. This describes the importance of good design and how this can be achieved through planning decisions.
- 8.2. Paragraph 67 control over outdoor advertisements confirms that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

The London Plan (March 2016)

The following London Plan policies are relevant to this submission:

- 7.4 Local character
- 7.5 Public realm
- 7.6 Architecture

The Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Planning Practice Guidance - Advertisements

LLDC Local Plan (2015)

8.4. The London Legacy Development Corporation Local Plan 2015-2031 was adopted on 21st July 2015 and provides the formal local policy basis for planning decisions.

- 8.5. The site is within the Central Stratford and Southern Queen Elizabeth Olympic Park Sub Area as defined in the Local Plan; the entire site is also within the defined Metropolitan Centre. The site has no specific allocation in the Local Plan. Great Eastern Road and the pedestrian route from Meridian Square via steps to the Town Centre Link Bridge are shown as key connections where improved connectivity and public realm improvements are promoted (Policy 3.2).
- 8.6. Policies which are relevant to the consideration of this submission are:
 - BN.9 Protecting Key Views
 - BN.15 Designing Advertisements

8.7. The Draft London Plan (December 2017)

The Mayor of London published for the purpose of public consultation a draft new London Plan on 29th November 2017. The policies in the draft new London Plan currently have only very limited material weight when making planning decisions. That weight will increase once the new Plan is submitted for its Examination in Public. This report may make reference to policies within the new London Plan where they are directly relevant to the assessment of the application proposal. However, the relevant development plan policies remain those within the current London Plan (March 2016) and the LLDC Local Plan (July 2015).

9. CONSULTATION SUMMARY

- 9.1. Four site notices were placed in various location within the vicinity of the site on the 1st May 2018. No responses have been received.
- 9.2. **LB Newham Planning, Highways and Environmental Health** No response at the time of writing. Members will be advised of any comment received at Committee.
- 9.3. **Transport for London (TfL)** TfL does not object to this proposal. However, TfL would like to include informatives that:
 - All vehicles associated with construction and maintenance shall only park or stop away from the Stratford regional rail and bus station and Great Eastern Way bus and coach stops, in order to avoid obstruction to bus and coach operations.
 - TfL would be interested in exploring the opportunity for this screen to also display
 any important travel news or information which would be to the assistance of all
 people in the vicinity of the screen, and would be pleased to discuss this with the
 relevant controller of the screen.
- 9.4. **Applicant response:** Conversations are ongoing between Westfield and TfL regarding the display of messaging on Westfield screens in general. The applicant has advised that the approach and particular screens are yet to be determined therefore at this stage Westfield cannot commit to any resolution on a specific screen.
- 9.5. **PPDT Environmental Consultants** PPDT's environmental consultants have reviewed the applications in particular to advise whether the illumination levels proposed are appropriate. They comment:
 - Assuming the average luminance will not exceed 300cd/m² it will be compliant with the maximum building luminance limit in Table 2 of the Institution of Lighting Professionals (ILP), Guidance Notes for the Reduction of Obtrusive Light GN01:2011 for an E4 Environmental Zone (High district brightness (town centres with high levels of night-time activity)).
 - The proposed lighting is unlikely to be obtrusive in the context of this location.

9.6. PPDT Transport Consultants - PPDT Transport Consultants comment that the proposed digital media screen does not raise concerns from a transport perspective and it is not considered likely to be a material distraction for drivers. They also note TfL's comments submitted on 17th May 2018 stating their interest in exploring the opportunity for this screen to also display any important travel news or information. PPDT Transport Consultants echo this and support the possibility of the screen being used to provide travel information.

10. ASSESSMENT OF PLANNING ISSUES

Background to Submission:

- 10.1 On the 27th March 2018 under planning reference 16/00524/FUL planning permission was granted for a two-phased development (known as Angel Lane) as set out below:
- 10.1.1 Phase 1 a fourteen-storey building comprising a 192-bedroom youth hostel facility (sui generis use), together with landscaping, public realm and other associated works;
- 10.1.2 Phase 2 eighteen-storey building comprising 22,726 sqm (GEA) of office (use class B1a) and 369 sqm (GEA) of retail floorspace (use class A1-A5).
- 10.1.3 Whilst the development is yet to be commenced as set out in paragraphs 7.13 and 7.14 planning permission was recently granted for enabling infrastructure works which includes the demolition of the existing British Transport Police building on the site, together with the construction of a new temporary station escape ramp/stairs and associated works.
- 10.2 These Angel Lane proposals included illustrative images of a media screen incorporated within the phase 2 office block proposals. The proposals were for a significantly larger media advertising screen than that currently proposed and the existing standalone media screen. At the time (pre-application stage) Officers and QRP expressed concern at the proposed retention and size of the media screen. The applicant was advised that should they wish to proceed and submit an application for advertisement consent the proposals would need to explore ways of incorporating the media screen into the building's façade whilst having regard to Local plan policy BN.15 (Designing Advertisements) which provides the criteria within which visual amenity and safety of advertisement proposals can be assessed.
- 10.3 The applicant has taken on board officers' and QRP's comments and the office building has been designed from the outset to include a media screen of dimensions smaller than the existing standalone media screen within Meridian Square. The proposed screen was identified albeit indicatively in the documents submitted with the 16/00524/FUL planning application.
- 10.4 The Control of Advertisements is governed by the provisions of the Town and Country Planning (Control of Advertisement) Regulations 2007 and provides the scope of the relevant considerations. The regulations and the National Planning Policy Framework (NPPF) specify that, when determining advertisements applications Local Planning Authorities shall exercise their powers in the interests of amenity and public safety, taking into account material provisions of the development plan so far as they are material and any other relevant factors.

Amenity:

10.5 Local Plan policy BN.15 provides criteria against which amenity and safety of advertisement proposals can be assessed. The policy states that advertisements would be acceptable where they do not have an adverse impact on amenity, outlook from residential properties, the character or scale of the building or street or on a heritage asset or its setting. Advertisements are also considered acceptable where they do not protrude above the roofline of a building, are not attached to a residential

- building, do not obscure architectural features and do not result in proliferation of signs and visual clutter.
- 10.6 The proposed media screen would sit within the commercial environment that is the Stratford Metropolitan Town Centre. The signs are therefore viewed in this context. This site is located close to the mezzanine level entrance to Stratford Regional Station and Stratford Bus Station. The proposal effectively replaces a larger digital media screen already in existence in this location and broadly retains the scale and proportion of the existing screen. The applicant has provided a verified view to give a sense of the proportions of the screen and its new context. In particular, it is noted that the position and orientation of the office block and the south-west elevation on which the display is proposed is such that the media screen would primarily be visible from the commercial areas of Stratford.
- 10.7 The new digital media screen would sit proud of the columns but be in line with the reflective glass cladding above (approved under application reference 15/00524/FUL). It would therefore appear as an integrated part of the architecture on the building's elevation. Officers are satisfied that it would not dominate or overwhelm the elevation, and there would be a good proportion of solid cladding remaining around the new screen and its size would be offset by the size of the Westfield office building.
- Officers consider that the proposed location allows the screen to sit logically in the composition of the new office building's south-western elevation having due regard to the architectural features of the building, such as the stainless-steel media screen shroud casing reflecting the metal framework of the office façade. The proposal would not compromise the proposed retail frontages or the aspect of the office floors. Officers are of the view that overall the proposals are an improvement over the current condition. It is considered that the signage would be proportional and well-ordered within the elevation.
- 10.9 The proposal would respect the appearance and scale of the host building and would have an acceptable impact upon the street scene and the Meridian Square public realm. It is noted that there are within the town centre, including Westfield, a number of large digital screens located on similarly large facades. Indeed, there is an existing digital media screen affixed to the front entrance of the main Stratford Regional Station adjacent to Meridian Square. However, the existence of existing large adverts, and the approval of the proposed media screen if forthcoming, should not be considered to set a precedent for further such signs. The proposed media screen, both in isolation and having regard to existing signage within the town centre, is assessed to not have an unacceptable impact upon amenity. Officers are satisfied that what is in effect a replacement media screen would not result in a proliferation of signs or visual clutter.
- 10.10 The nearest residential properties to the media screen are approximately 200m from the application site; officers are satisfied that given the orientation of the screen which would face south-west and the orientation and distance to the nearest residential properties (due south) there would be no harm to residential amenity, including outlook. PPDT's environmental consultants have reviewed the submission and have raised no objections. The illuminance of the signage would be restricted to 300 cd/m2, which is in accordance with the guidance contained within the Institute of Lighting Professionals with regards to the brightness of illuminated adverts. The applicant has also advised that in addition, the screen would be of a maximum luminance of 300 cd/m2 during the hours of daylight, reduced to a maximum of 240 cd/m2 during the hours of darkness. It is understood that the display brightness is remotely programmed to change with the seasons.

Public safety:

- 10.11 The signage to the façade of the office building would be located at a high level and would not pose a hazard to pedestrian safety. The existing signage is visible from the public and to vehicular traffic travelling in a northern direction along Great Eastern Road. It is not considered that the proposed advertisement would give rise to any material highway or other safety issue. PPDT's Transport Consultants have reviewed the submission documents and conclude that the media screen does not raise concerns from a transport perspective, and it is not considered likely to be a material distraction for drivers. TfL do not raise any objection to the proposal.
- 10.12 Officers conclude that the proposed media screen is considered to be proportionate to the scale of the office building and the scale of the surroundings and would not result in unnecessary clutter.
- 10.13 Officers are satisfied that the proposed signage would not harm the visual amenity of the surrounding area or the architectural integrity of the office block. Officers are also satisfied that it would not adversely affect the visual amenity of the area nor have any detrimental impacts on highway safety.
- 10.14 The media screen is acceptable and in accordance with policies, 7.4, 7.5 and 7.6 of the London Plan, and policy BN.15 the Local Plan.

11. HUMAN RIGHTS & EQUALITIES IMPLICATIONS

- 11.1. Members should take account of the provisions of the Human Rights Act 1998 as they relate to the application and the conflicting interests of the Applicants and any third party opposing the application in reaching their decisions. The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report. In particular, Article 6 (1), of the European Convention on Human Rights in relation civil rights and a fair hearing; Article 8 of the ECHR in relation to the right to respect for private and family life and Article 1 Protocol 1 of the ECHR in relation to the protection of property have all been taken into account.
 - 11.1.1.In addition, the Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. It places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty inter alia when determining all planning applications. In particular Members must pay due regard to the need to:
 - 11.1.2. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;
 - 11.1.3. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and;
 - 11.1.4.Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 11.2. Officers are satisfied that the submitted details have taken into account these issues.

12. CONCLUSION

12.1. It is considered that the proposed integrated media screen would be acceptable within the commercial context of Stratford Town Centre, and is of an appropriate size and scale to ensure it would not be unduly dominant, or create visual clutter in accordance with

both The London Plan and Local Plan. As assessed by PPDT's transport and environmental consultants the media screen would not be a hazard to amenity or public safety.

12.2. Taking into account all relevant factors, including the existing standalone slightly larger screen, which would be removed as part of the proposal, officers' analysis concludes that the impact on visual amenity is acceptable; and the proposal would not be detrimental to public safety. It is therefore recommended that advertisement consent is granted subject to the conditions set out below.

13. Conditions

13.1 Works in accordance with approvals

The approved scheme shall be carried out in accordance with the following details: Application form dated 6 April 2018; Drawings ref: CS 1251 0331; and CS 1251 0332 Rev A; and the description of development contained in the application and any other plans, drawings, documents, details, schemes or strategies which have been approved by the Local Planning Authority pursuant to these conditions.

Reason: To ensure that all works are properly implemented and retained in accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

13.2 Luminance Levels

The luminance of the signage hereby permitted and any other associated lighting with the screen shall not exceed 300cd/m2.

Reason: To comply with the recommendations of the Institution of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Light (GN01:2011) in the interests of amenity.

13.3 Installation

Prior to the installation of the digital media screen hereby permitted the existing standalone media screen permitted under application reference 11/90036/ADVODA and highlighted in green on the plan attached to the decision notice shall be removed in its entirety and the site reinstated to its former condition or in accordance with planning permission reference 15/00524/FUL.

Reason: To avoid visual clutter through the proliferation of advertisements in accordance with Local Plan Policy BN.15.

13.4 Standard condition

The consent hereby given shall expire five years from the date of this notice.

No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

No advertisement shall be sited or displayed so as to:

- endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military);
- obscure, or hinder the ready interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or
- hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

Where an advertisement is required under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: To comply with the requirements of Regulation 14(7) of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

13.5 All vehicles associated with construction and maintenance shall only park or stop away from the Stratford regional rail and bus station and Great Eastern Way bus and coach stops, in order to avoid obstruction to bus and coach operations.

Reason: In the interests of highway safety and in accordance with Local Plan policy BN.15.

Informatives:

- The applicant is advised to continue discussions with TfL regarding the opportunity to display important travel news/information.
- The applicant is reminded that the advertisement consent relating to the existing standalone media screen, highlighted in green on the attached decision notice, has expired. The standalone media screen should therefore be removed or a further advertisement consent application should be submitted to the LPA for the assessment of its retention.

Appendices

Appendix 1 – Location Plan

Appendix 2 – Drawings

Appendix 3 – Photographs / Visualisation